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June 20, 2008

BY FACSIMILE
The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

DE NAOMI REICE BUCHWALD

UNITED STATES DISTINCT JUDGE

Re: <u>United States v. Ivy Woolf-Turk</u> 07 Cr. 1062 (NRB)

Dear Judge Buchwald:

DOC#:

DATE FILED: ?

The Government writes to request respectfully, with the consent of the defendant, an adjournment of the conference in the above-referenced matter, which is currently scheduled for June 23, 2008, for approximately thirty days.

Since the last conference, plea discussions between the parties have gotten back on track; however, the additional time will permit the parties to analyze further certain Guidelines issues which are relatively complex in this matter, and which require consultation between the Government and bankruptcy counsel in the related proceedings, who is currently unavailable. It is anticipated that a plea will be entered on the adjourned date.

The Government further requests that the time until the adjourned conference be excluded for Speedy Trial Act purposes, with the consent of the defendant, to permit the parties time to consider the terms of the disposition of this matter and in the interest of justice.

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Hon. Naomi Reice Buchwald

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June 20, 2008

Respectfully submitted,

MICHAEL J. GARCIA

United States Attorney

By:

Harry A. Chernoff

Assistant U.S. Attorney

(212) 637-2481

cc: Faith A. Friedman, Esq. (by facsimile)

TOTAL P.03